

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
LEXINGTON INSURANCE COMPANY and
TRAVELERS PROPERTY CASUALTY COMPANY
OF AMERICA as subrogees of Jones Lang LaSalle
Management Services, Inc.

**ANSWER TO THIRD-PARTY
DEFENDANT'S, COUNTER-
CLAIM**

Plaintiffs,

-against-

Docket No.: 07 CIV 9737

LOCHINVAR CORPORATION, AMBASSADOR
CONSTRUCTION CO., INC., DiGIACOMO & SON,
INC., and MANHATTAN MECHANICAL SERVICE,
INC.,

Defendants.

-----X
LOCHINVAR CORPORATION,

Third-party Plaintiff,

-against-

SOUTH ERIE PRODUCTION COMPANY, d/b/a
SEPCO ERIE
-----X

Defendant/third-party plaintiff, LOCHINVAR CORPORATION, by their attorneys,
RENDE, RYAN & DOWNES, LLP, answering the Counter-Claim of third-party defendant,
SOUTH ERIE PRODUCTION COMPANY, d/b/a SEPCO ERIE herein upon information and
belief:

1. Denies each and every allegation contained in the paragraph designated "16"
thereof.

WHEREFORE, the defendant/third-party plaintiff, LOCHINVAR CORPORATION,
demands judgment against the third-party defendant on the Counter Claim plus interest, and
against the third-party defendant for costs and disbursements.

Dated: August 1, 2008
White Plains, New York

Yours, etc.,

RENDE, RYAN & DOWNES, LLP.

By: _____/S
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Plaintiff
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CERTIFICATE OF SERVICE

This is to certify that on August 1, 2008, a copy of the foregoing **ANSWER TO COUNTER-CLAIMS** was served on the following counsel of record via electronic filing:

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